

**IN THE DISTRICT COURT FOR THE UNITED STATES OF AMERICA**  
**WESTERN DISTRICT OF MICHIGAN**  
*Southern Division*

**MICHEALA MICHELLE LUDWICK**, an individual

Plaintiff,

CASE NO. 25-cv-00320-JMB  
HON. JANE M. BECKERING

v.

**CLINTON COUNTY, MICHIGAN**, a state of Michigan municipality,  
et al.

Defendants

**DRAGON LAWYERS PC ©**

***Jacob A. Perrone (P71915)***

Attorneys for Plaintiff

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**PLAINTIFF LUDWICKS OBJECTION TO REPORT AND**  
**RECOMMENDATION FOR DISMISSAL**

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**NOW COMES** Plaintiff, **MICHEALA MICHELLE LUDWICK**, (hereinafter referred to as “*Ludwick*”), by and through her attorneys, **DRAGON LAWYERS PC ©**, and for her Objection to Report and Recommendation for Dismissal states as follows:

1. A Report and Recommendation (the “*Report*”) was filed in Document No. 9 in this matter on May 19, 2025, recommending dismissal pursuant to Fed R. Civ. P. 41(b) and W.D. Mich. LCivR 41.1. The *Report* affords *Plaintiff* an opportunity to show cause why this matter should not be dismissed.

2. *Plaintiff* maintains that this matter should not be dismissed based on the *Report* because *Plaintiff's* counsel needed additional time to verify with *Plaintiff* her intention and understanding of the disclosure due to the extremely sensitive nature of this matter and the significant national attention it has received and is anticipated to continue to garner. The national spotlight on this case was ever flowing with upwards of 15-20 media outlets picking up stories associated with this litigation. This is a jail case and *Plaintiff* had to not only weigh a disclosure of being in jail and the stigma associated therewith but also is valiantly disclosing sensitive and private health information because she believes it's the right thing to do.

3. *Plaintiff's* counsel spent excessive time so the *Plaintiff* had a full and fair opportunity to decide in light of the significant national media attention that had to be monitored for privacy and safety reasons. *Plaintiff* files this Objection immediately after the Report was filed on May 19, 2025, and requests a prompt decision on this Objection as *Plaintiff* intends to refile if the Court does not issues Summons filed simultaneously and allow *Plaintiff* to proceed. The deadline is June 6, 2025. Further, it should be noted that this case has a companion case (Docket No. 25-cv-368, Western District) where disclosure was required later than this matter and full disclosure is being made in that case also after a lull in attention.

Respectfully submitted,

**DRAGON LAWYERS PC ©**

Dated: May 21, 2025

/s/ *Jacob A. Perrone*

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